Postal Regulatory Commission Submitted 8/17/2018 8:45:45 AM Filing ID: 106258 Accepted 8/17/2018

Before the POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

NOTICE OF PROPOSED RULEMAKING TO REVISE THE PERIODIC REPORTING REQUIREMENTS Docket No. RM2018-2

COMMENTS OF U.S. CHAMBER OF COMMERCE August 17, 2018

The U.S. Chamber of Commerce (Chamber) writes in support of Section 3050.21 (m) of the Postal Regulatory Commission's planned rulemaking. The Postal Service should routinely provide, as part of its annual review process with the Commission, international data related to the Inbound Letter Post product that would "provide revenue, volume, attributable cost, and contribution data by Universal Postal Union country group and by shape for the preceding five fiscal years."

The Chamber has made previous submissions expressing our strong support for the Commission's efforts to bring greater transparency to international inbound shipments. Transparency is critical, as the Universal Postal Union has promoted a "special arrangement" for government-designated and government-protected enterprises that operates under a cloak of secrecy, distorts international e-commerce, and imposes unfair and unreasonable harm on U.S. domestic merchants and U.S. companies providing international delivery services.

Through this rulemaking, the Postal Service will be required to make data on inbound international letter post annually available to the Commission. Moreover, the Chamber submits that such data should be made available to the public so long as delivery rates for inbound letter post are established by intergovernmental agreement and not equally available to domestic mailers and private international carriers.

Respectfully submitted,

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